

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SHAWN CAREY, MSS CAPITAL, LLC,
HUNTS ROAD, LLC, ION1 LLC,
BRICKELL CAPITAL SOLO 401K TRUST,
KAILEY LEWIS, EDWARD REINLE,
EMANUEL VALADAKIS and ZITAH
MCMILLAN-WARD, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

MICHAEL MOE, PETER B. RITZ, LZG
INTERNATIONAL, INC., ROGER
HAMILTON, and GENIUS GROUP
LIMITED,

Defendants.

Case No. 1:24-cv-07551

GENIUS GROUP LIMITED,

Petitioner,

v.

LZG INTERNATIONAL, INC., MICHAEL
THOMAS MOE and PETER RITZ,

Respondents.

VSTOCK TRANSFER, LLC,

Nominal Respondent.

LZG INTERNATIONAL, INC.'S
SHAREHOLDERS,

Intervenor.

Case No. 1:24-cv-08464

PLAINTIFFS' NOTICE OF RULE 4(F)(3) MOTION FOR ALTERNATIVE SERVICE

PLEASE TAKE NOTICE that, on a date and time as may be set by the Court, Plaintiffs will respectfully move this Court, pursuant to Federal Rule of Civil Procedure 4(f)(3), for entry of an Order authorizing alternative service on Defendants Genius Group Limited and Roger Hamilton, through GNS's US-based counsel, via email. This motion is based on the accompanying Memorandum of Law and Declaration of Bernardo Franco in support hereof, the pleadings and other filings herein, and such other written and oral argument as may be permitted by the Court.

For the foregoing reasons, Plaintiffs respectfully request that the Court (1) authorize alternative service on GNS and Hamilton through GNS's US counsel, via email, under Rule 4(f)(3), and (2) grant such other and further relief as the Court may deem just and proper.

Dated: December 20, 2024

Respectfully Submitted,

AXS LAW GROUP, PLLC
2121 NW 2nd Avenue, Suite 201
Miami, FL 33127
Tel: 305.297.1878

By: /s/ Jeffrey W. Gutchess
Jeffrey W. Gutchess
jeff@axslawgroup.com
Bernardo N. M. Franco
bernardo@axslawgroup.com
eservice@axslawgroup.com

Counsel for the Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on December 20, 2024, a true and correct copy of the foregoing was served on all counsel of record via CM/ECF.

By: /s/ Jeffrey W. Gutchess
Jeffrey W. Gutchess